

Section 3.0

Environmental Analysis

This Environmental Impact Report (EIR) analyzes those environmental issue areas as stated in the Notice of Preparation (NOP) where potentially significant impacts have the potential to occur ([Appendix A](#)).

SECTION CONTENT AND DEFINITION OF TERMS

The EIR examines the following environmental factors outlined in the CEQA Guidelines Appendix G Environmental Checklist Form, as follows:

- 3.1 Aesthetics
- 3.2 Air Quality
- 3.3 Biological Resources
- 3.4 Cultural Resources
- 3.5 Energy Conservation and Climate Change
- 3.6 Geology and Soils
- 3.7 Hazards and Hazardous Materials
- 3.8 Hydrology and Water Quality
- 3.9 Land Use and Planning
- 3.10 Noise
- 3.11 Public Services and Recreation
- 3.12 Transportation
- 3.13 Tribal Cultural Resources
- 3.14 Utilities and Service Systems

The following environmental issue areas are addressed in [Section 4.0, Effects Not Found to Be Significant](#):

- Agriculture and Forestry Resources
- Mineral Resources
- Population and Housing
- Wildfire

Each potentially significant environmental issue is addressed in a separate section of the EIR ([Sections 3.1](#) through [3.14](#)) and is organized into the following general subsections:

- ***Environmental Setting*** describes the physical conditions that exist at this time and that may influence or affect the issue under investigation.

- **Regulatory Framework** describes the pertinent policy, standards, and codes that exist at this time and which may influence or affect the regulatory environment of the proposed project.
- **Impact Analysis and Mitigation Measures** describes the thresholds that are the basis of conclusions of significance, which are primarily the criteria in the CEQA Guidelines Appendix G Environmental Checklist.

IMPACT ANALYSIS

The level of significance identifies the degree or severity of an impact with implementation of the proposed project. Project impacts are the potential environmental changes to the existing physical conditions that may occur if the proposed project is implemented. Impacts are classified as potentially significant impact, less than significant impact, or no impact.

Major sources used in crafting significance criteria include the CEQA Guidelines; local, state, federal, or other standards applicable to an impact category; and officially established significance thresholds. “An ironclad definition of significant effect is not possible because the significance of any activity may vary with the setting” (CEQA Guidelines Section 15064[b][1]). Principally, “a substantial, or potentially substantial, adverse change in any of the physical conditions within an area affected by the project, including land, air, water, flora, fauna, ambient noise, and objects of historic and aesthetic significance” constitutes a significant impact (CEQA Guidelines Section 15382).

Evidence, based on factual and scientific data, is presented to show the cause-and-effect relationship between the proposed project and the potential changes in the environment. The exact magnitude, duration, extent, frequency, range, or other parameters of a potential impact are ascertained, to the extent possible, to determine whether impacts may be significant when compared to the presented criteria. All of the potential direct and reasonably foreseeable indirect, construction-related (short-term), and operational and maintenance (long-term) effects are considered. Each section also addresses cumulative impacts (described further below) and identifies any significant and unavoidable impacts.

MITIGATION MEASURES

Mitigation measures are those project-specific measures that would be required of the proposed project to avoid a significant adverse impact; minimize a significant adverse impact; rectify a significant adverse impact by restoration; reduce or eliminate a significant adverse impact over time by preservation and maintenance operations; or compensate for the impact by replacing or providing substitute resources or environment. Mitigation measures are included throughout

Sections 3.1 through 3.14, where necessary, to address an identified potentially significant impact.

Where significant impacts cannot be feasibly mitigated to less than significant levels, they would be considered significant and unavoidable impacts. To approve a project with unavoidable significant impacts, the lead agency must adopt a Statement of Overriding Considerations. In adopting such a statement, the lead agency is required to balance the benefits of a project against its unavoidable environmental impacts in determining whether to approve the project. If the benefits of a project are found to outweigh the unavoidable adverse environmental effects, the adverse effects may be considered “acceptable” and the project approved (CEQA Guidelines Section 15093[a]).

CUMULATIVE IMPACT EVALUATION

Cumulative impacts are defined in the CEQA Guidelines (Section 15355) as “two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.” A cumulative impact occurs from a “change in the environment which results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor, but collectively significant, projects taking place over a period of time.” Consistent with CEQA Guidelines Section 15130(a), the discussion in this EIR focuses on the identification of any significant cumulative impacts and, where present, the extent to which the proposed project would constitute a considerable contribution to the cumulative impact. CEQA Guidelines Section 15130(b) states the following:

The discussion of cumulative impacts shall reflect the severity of the impacts and their likelihood of occurrence, but the discussion need not provide as great of detail as is provided for the effects attributable to the project alone. The discussion should be guided by the standards of practicality and reasonableness and should focus on the cumulative impact to which the identified other projects contribute rather than the attributes of other projects which do not contribute to the cumulative impact.

Cumulative Impact Methodology

To identify the projects to be analyzed in the evaluation of cumulative impacts, CEQA Guidelines Section 15130(b) requires that an EIR employ one of the following:

- **List Approach** – Entails listing past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside of the control of the agency; or
- **Projection Approach** – Uses a summary of projections contained in an adopted general plan or related planning document, or in a prior environmental document that has been adopted or certified, which described or evaluated regional or area-wide conditions contributing to the cumulative impact.

The approach and geographic scope of the cumulative impact evaluation vary depending on the environmental topic area being analyzed. The individual cumulative impacts discussion in the section addressing each environmental topic presents impacts and mitigation measures for the proposed project. Each impact begins with a summary of the approach and the geographic area relevant to that environmental topic area. For most environmental topic areas, the list approach is used. The list of potentially relevant projects, a detailed methodology, and relevant planning documents are considered in each cumulative impact discussion.

Past projects include those land uses that have been previously developed and comprise the existing environment. Present projects include those projects recently approved or under construction. Probable future projects are those that are reasonably foreseeable, such as those for which an application is on file and in process with a local planning department. The cumulative projects listed in [Table 3.0-1, Cumulative Projects](#), have been determined to be reasonably foreseeable. The list was developed in consultation with the City's Planning Department. These projects are considered in the cumulative impact analysis as appropriate. Refer to [Figure 3.0-1, Cumulative Projects Map](#), for the location of each project relative to the project site.

Table 3.0-1: Cumulative Projects

Map No.	Project Number	Project Name	Location	Description
1	16-165	Sanderling Waldorf School	749 Mays Hollow Lane	Pre-K/K-8 private school
2	15-235	O'Brien/Mobile Station Car Wash	310 Encinitas Boulevard	Automated car wash facility
3	16-211	Requeza Residential Subdivision	710 Requeza	13 single-family units
4	15-064	Colrich Subdivision	712 Clark Avenue	13 single-family units
5	12-188	TPM Case 12-188	604 Camino De Orchidia	4 single-family units
6	16-282	Alcove Residential Subdivision	762/782 Leucadia Boulevard	13 single-family units
7	17-080	Ocean Bluff Development	Encinitas Boulevard, south of Delphinium	69 assisted beds/ 144 living units

Table 3.0-1, continued

Map No.	Project Number	Project Name	Location	Description
8	89-014	Encinitas Beach Resort Hotel	La Costa Avenue at Highway 101	130 hotel rooms and restaurant
9	17-205	Surfer's Point Hotel	La Costa Avenue at Highway 101	25 timeshare units
10	2750-2018	La Costa Hotel	516 La Costa Avenue	17-room hotel/restaurant
2019 HEU Projects (Applications Currently on File)				
11	3427-2019	Encinitas Blvd. Apartments	2220, 2230, and 2228 Encinitas Boulevard	283 dwelling units
12	3629-2020	Sunshine Gardens Apartments	630 Encinitas Boulevard	140 dwelling units

Source: City of Encinitas March 2020; City of Encinitas 2019 City of Encinitas Housing Element Update; Vehicle Operations and Queuing Analysis (Appendix O-2).

As noted above, probable future projects include those for which an application is on file and in process at the time of issuance of the Notice of Preparation. Following the City's approval of the 2019 Housing Element Update, including the Local Coastal Program Amendment and certification from the California Department of Housing and Community Development, several Housing Element sites are currently in process and have either filed or are in the process of filing an application. For the 15 sites included in the 2019 HEU, three had filed an application prior to issuance of the NOP for the project (March 27, 2020). These include the proposed project, the Encinitas Boulevard Apartments project, and the Sunshine Gardens Apartments project. Two other HEU sites, Fenway North Highway 101 and Quail Meadows Apartments, were submitted to the City after the issuance of the project's NOP. Although CEQA does not require updating this project list after release of the NOP, the City has made a good faith effort to update cumulative project data subsequent to the NOP and prior to release of the Draft EIR for public review.

While they had not done so at the time the NOP was filed for the proposed project, it is reasonably foreseeable the remaining 12 HEU sites will also file an application; therefore, to be conservative, all of the 2019 Housing Element Update sites have been included in the cumulative impact analysis to the extent that they may contribute to certain issue-specific cumulative effects (i.e., public services such as school services; recreation; sewer capacity; transportation, etc.). Thus, the cumulative analysis in this EIR is based on a "worst-case" assumption that the HEU sites all develop. The HEU sites (including the proposed project and the two listed in [Table 3.0-1](#)) are identified in [Table 3.0-2, Housing Element Update Sites](#), and are shown with the estimated potential number of dwelling units that may be allowed with application of the Density Bonus allowance.

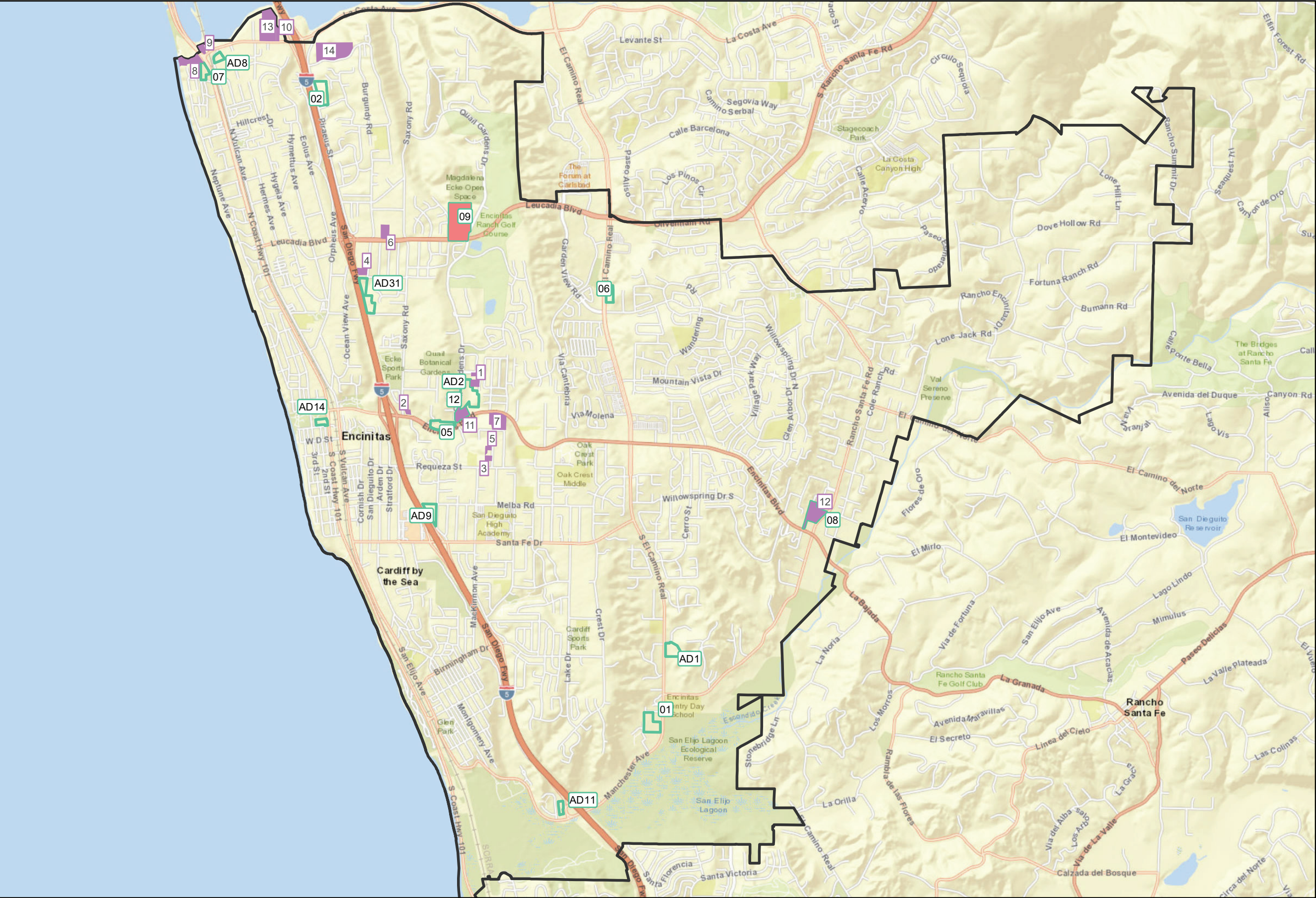
Table 3.0-2: Housing Element Update Sites

Map No.	Project Name	Location	Allocated DUs in HEU ¹
1	Greek Church Parcel	3459 Manchester Avenue	50
2	Cannon Property	Piraeus Street	173
5	Encinitas Boulevard & Quail Garden Sites	696 & 550 Encinitas Blvd, Quail Gardens Drive	119
6	Armstrong Parcels	N. El Camino Real	55
7	Fenway North Highway 101	1950 Highway 101	84 ¹
8	Rancho Santa Fe (Gaffey/Goodsen) Project	2220, 2230, and 2228 Encinitas Boulevard	283 ¹
9	Echter Property (Proposed Project)	1150 Quail Gardens Drive	250
12	Sunshine Gardens	630 Encinitas Boulevard	140 ¹
AD1	Sage Canyon	Sage Canyon Drive	60
AD2	Quail Meadows Apartments	Mays Hollow Ln, 225 Quail Gardens Drive	485 ¹
AD8	Vulcan & La Costa	1967 N Vulcan Avenue	50
AD9	Sea Coast Church	1050 Regal Road	35
A11	Manchester Avenue West Sites	2951 Manchester Avenue	41
AD14	Harrison Sites	364 and 371 2nd Street	21
AD31	Meyer Proposal	662, 672, and 682 Clark Avenue; 556 Union Street	163
Total			2,009

Notes:

¹ Denotes the number of DUs proposed with the application as currently being processed through the City.

Source: City of Encinitas Housing Element Update; Table C-2: Net Acreage and Unit Yield Per Site; Correspondence with City of Encinitas, Planning Division, July 10, 2020.



Legend

- Project Site (Echter Property)
- Cumulative Projects
- Housing Element Update Sites
- City of Encinitas Boundary

Cumulative Projects	
ID	Project Name
1	Sanderling Waldorf School
2	O'Brien/Mobile Station Car Wash
3	Requeza Residential Subdivision
4	Colrich Subdivision
5	TPM Case 12-188
6	TM #16-282
7	Ocean View Development
8	Encinitas Beach Resort
9	Surfer's Point Hotel
10	516 La Costa Development
11	Sunshine Gardens
12	Rancho Santa Fe (Gaffney/Goodsen)
13	Weston Residential Subdivision
14	Skyloft Residential Subdivision

Housing Element Update Sites	
ID	Site Name
01	Greek Church Parcel
02	Cannon Property (Piraeus)
05	Encinitas Blvd & Quail Gardens Sites
06	Armstrong Parcels
07	Fenway North Highway 101
08	Rancho Santa Fe Parcels (Gaffney/Goodsen)
09	Echter Property (Project Site)
12	Sunshine Gardens Parcels
AD1	Sage Canyon
AD2	Quail Meadows Apartments
AD8	Vulcan & La Costa
AD9	Seacoast Church
AD11	Manchester Avenue West Sites
AD14	Harrison Sites
AD31	Meyer Proposal

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